

# BUCKLEY

**Daniel R. Alonso**

Partner

1133 Avenue of the Americas

Suite 3100

New York, NY 10036

T (212) 600-2340

dalonso@buckleyfirm.com

April 21, 2021

VIA ECF

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Shah, et al, 19 Cr. 833 (S-4) (SDNY)

Dear Judge Stein:

We represent Jennifer Shah in the above-referenced matter. At Ms. Shah's arraignment on April 2, the Court set May 10 as the date for omnibus defense motions for the two defendants arraigned that day—Ms. Shah and Stuart Smith. We respectfully request an extension of that date to June 18. The government has no objection to our application, and requests three weeks to respond. Counsel for Mr. Smith indicated that he does not object either.

By way of brief explanation, the previous indictments under this docket number (U.S. v. Cheedie, et al.) had been pending for 16 months before our client was arrested or arraigned. We were engaged the same day Ms. Shah appeared before the Court, and had had no prior involvement with the matter. Since then, we have worked diligently to familiarize ourselves with a very complex case involving a related indictment that was tried, more than two dozen defendants between both cases, and, most significantly, a tremendous volume of discovery materials. Although we do not have a page count, the discovery in this case adds up to more than 277 gigabytes of data, which could well number a million pages or more pages of documents. The government has been reasonably diligent in providing us access to materials, and Ms. Greenwood has been extremely helpful, but in order to assess adequately the potential motions we may file in good faith on behalf of our client, we require more time.

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Thank you for the Court's consideration of this application. We are of course available for a conference if you have questions.

Respectfully submitted,

/s/  
Daniel R. Alonso

cc: All counsel (by ECF)

SO ORDERED:

HON. SIDNEY H. STEIN, U.S.D.J.